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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

KRISTINA M. REEVES O/B/O K. M. M.,

Plaintiff,

v.

MARTIN O'MALLEY,
Commissioner of Social Security,

Defendant.

Case No.: 2:24-cv-00202-BNW

**UNOPPOSED MOTION FOR
EXTENSION OF TIME
(FIRST REQUEST)**

Defendant, Martin O'Malley, Commissioner of Social Security (Defendant), respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Brief (Dkt. No. 18, filed on April 29, 2024), currently due on May 29, 2024, by 30 days, through and including June 28, 2024. Defendant further requests that the deadline for Plaintiff's optional reply brief be extended to July 12, 2024.

This is Defendant's first request for an extension of time to file a response. Good cause exists for this extension. Counsel is experiencing an extremely heavy workload, despite due diligence. Counsel is preparing the Commissioner's response briefs for multiple district court and Ninth Circuit

1 cases with concurrent deadlines. Counsel also has additional responsibilities that have compounded
2 these workload issues, including the responsibility of training and reviewing the work of a newly hired
3 attorney who also has concurrent deadlines. Counsel for Defendant advised counsel for Plaintiff of the
4 need for this extension on May 23, 2024. Counsel for Plaintiff confirmed that Plaintiff does not object
5 to this request.

6 It is therefore requested that Defendant be granted an extension of time to respond to Plaintiff's
7 Brief, through and including June 28, 2024. This request is made in good faith and with no intention
8 to unduly delay the proceedings.

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10 Dated: May 23, 2024

Respectfully submitted,

11 JASON M. FRIERSON
12 United States Attorney

13 /s/ David Priddy
14 DAVID PRIDDY
15 Special Assistant United States Attorney

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17 IT IS SO ORDERED:

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19 UNITED STATES MAGISTRATE JUDGE

20 DATED: May 24, 2024
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CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 6401 Security Boulevard, Baltimore, Maryland 21235. I am not a party to the above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR EXTENSION OF TIME (FIRST REQUEST)** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

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Attorneys for Plaintiff

Dated: May 23, 2024

/s/ David Priddy
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